

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Warren L. Peterson, Esq.

170 N. County Line Rd.

Jackson, NJ 08527

(732) 367 3670

Attorney for Debtor, John A. Filardo

In Re:

Case No: 19-13694-MBK

John A. Filardo

Hearing Date: 06/26/2019 @ 10:00am

Chapter: 13

Judge: Michael B. Kaplan

**Opposition of motion for relief from stay filed by Freedom
Mortgage**

We kindly apologize for the failure to file this opposition. This motion was inadvertently not docketed in our records. This motion was noticed this morning and we ask that the court please observe this late filing. Please be advised that this filing is in opposition to Freedom Mortgage Corporation's Motion for relief from stay. The petitioner will Amend the Chapter 13 plan to pay Freedom Mortgage's claim in full.

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CERTIFICATION OF SERVICE

1. I, Matthew Lopreiato:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Warren L. Peterson, Esq. in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On June 26, 2019 I sent a copy of the following pleadings and/or documents to the parties listed below:

Opposition of motion for relief from stay filed by Freedom Mortgage

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: June 26, 2019

/s/ Matthew Lopreiato
Matthew Lopreiato

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
<p>Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853</p>	<p>Trustee</p>	<p><input type="checkbox"/> Hand-delivered</p> <p>Regular Mail</p> <p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other _____ (as authorized by the court *)</p>
<p>Robert J. Davidow, Esquire 1617 JFK Blvd. Suite 1400 Philadelphia, PA 19103</p>	<p>Creditor's Attorney</p>	<p><input type="checkbox"/> Hand-delivered</p> <p>Regular Mail</p> <p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other _____ (as authorized by the court)</p>

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.